

UNITED STATES OF AMERICA,
ex rel. **DICKSON,**

Plaintiff,

V.

Case No. 3:09CV438

**TOYO INK MANUFACTURING CO.,
LTD; TOYO INK INTERNATIONAL
CORPORATION; TOYO INK AMERICA,
LLC; TOYO INK MFG. AMERICA, LLC;
and PYOSA, S.A. DE C.V.,**

Defendants.

JOINT STIPULATION OF DISMISSAL

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of the December 13, 2012 Settlement Agreement (the “Settlement Agreement”) among the United States; Toyo Ink SC Holdings Co., Ltd. (successor in interest to Toyo Ink Manufacturing Co., Ltd.), Toyocolor Co., Ltd., Toyo Ink Co., Ltd., Toyochem Co., Ltd., Toyo Ink Mfg. America, LLC, Toyo Ink International Corp., and Toyo Ink America, LLC (collectively, Toyo); and Relator John Dickson, the United States and Relator hereby stipulate, through their undersigned counsel, to the entry of an order (1) dismissing with prejudice all claims asserted on behalf of the United States against Toyo for the Covered Conduct as defined in Preamble Paragraph C of the Settlement Agreement; (2) dismissing without prejudice to the United States and with prejudice to Relator all other claims asserted on behalf of the United

States; and (3) dismissing with prejudice all claims asserted on behalf of Relator for attorneys' fees under 31 U.S.C. § 3730(d).

Relator, on behalf of himself, his heirs, successors, attorneys, agents, and assigns, stipulates that the Settlement Amount set forth in the Settlement Agreement and the terms and conditions described therein are fair, adequate, and reasonable under all the circumstances, that he will not challenge the settlement pursuant to 31 U.S.C. § 3730(c)(2)(B), and that he expressly waives the opportunity for a hearing on any objection to the settlement pursuant to 31 U.S.C. § 3730(c)(2)(B).

The United States and Relator respectfully request that the Court enter an order in the form of the attached, proposed order.

DATED this 19th day of December, 2012.

Respectfully Submitted,

FOR THE UNITED STATES:

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Principal Deputy Assistant Attorney General
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United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 2012, a true and correct copy of the foregoing was served upon the parties below by mailing a copy thereof, postage prepaid and properly addressed as indicated or by service through the court's ECF/PACER electronic email noticing system:

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/s Paul B. Taylor

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